

REMARKS

Claims 15-19 have been amended, and claim 20 has been cancelled. Claims 1-19 are pending, of which claims 1, 3, 8, 9 and 14 are independent claims.

Claims 15-19 have been amended to now depend from claim 1 or claim 9 as appropriate, and claim 20 has been cancelled. Thus it is respectfully submitted that the rejection of claims 15-20 under 35 U.S.C. § 103(a) is no longer applicable. Moreover, claims 15-19 now incorporate by reference the features recited in independent claims 1 and 9. As claims 1 and 9 are seen to be patentable as discussed below, it is respectfully submitted that claims 15-19 are also presently allowable.

Claims 1, 3, 8, 9, and 14 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent 6,154,777 (Ebrahim) and US Patent 6,580,717 (Higuchi). This rejection is respectfully traversed.

Claim 1 recites a data communications device which is capable of interconnecting between a client and the domain name service server, wherein the data communications device includes a controller configured to (i) intercept a first domain name service request from the client, and (ii) provide a second domain name service request to the domain name service server through the interface in response to interception of the first domain name service request, the second domain name service request selectively (i) including a client identifier which identifies the client, and (ii) not including the client identifier which identifies the client, based on a selection decision. As described in the application and set forth in claim 6 for example, the selection decision may include whether or not the first domain name service request includes a domain name field which contains a domain name that belongs to a predetermined group of domain names.

As acknowledged in the Office Action, Ebrahim does not teach or suggest a data communications device that interconnects between a client and a domain name service server and that provides a second domain name service request

that selectively includes a client identifier or not based on a selection decision. Ebrahim is understood to show a name resolver (which may be located at different points in the network) that performs name resolution based on "caller context" (such as caller's IP address) that is provided as part of a name resolution request. There is no suggestion of selectively providing such caller context based on anything that can be characterized as a selection decision.

Higuchi is seen to disclose a packet communication method that employs a "protocol conversion" module that can selectively convert an IPv4 address into an IPv6 address depending on whether the IPv4 address is registered in an address table of the protocol conversion module. Higuchi is not seen to teach or suggest any functionality pertaining to domain name service requests or the selective inclusion of any client identifier that identifies a DNS client based on a selection decision. Higuchi's technique operates at the IP layer based on IP addresses alone; it has no pertinence to the translation of domain names to IP addresses. Furthermore, whether a conversion from an IPv4 address to an IPv6 address happens or not for a particular packet in the system/method of Higuchi, either address identifies the source of the packet, and thus there is no situation in which an identifier of the packet source (e.g. a client machine) is not included in a forwarded packet.

Based on the above understanding of the Ebrahim and Higuchi references, it is respectfully submitted that these references cannot render the invention of claim 1 obvious under 35 U.S.C. § 103(a). The combination of these references fails to teach or suggest a data communications device that selectively includes or does not include a client identifier in a second domain name service request based on a selection decision. Ebrahim is seen to teach including "caller context" in requests for domain name translation, with no teaching of only selectively including such caller context. And Higuchi is seen to teach only the selective translation of an IPv4 address to an IPv6 address, which firstly does not pertain to domain name service requests and secondly cannot result in the non-inclusion of an identifier of the source of the packet. Because

-13-

these references fail to teach or suggest at least this feature of claim 1, claim 1 is seen to be allowable under 35 U.S.C. § in view of these references.

The remaining claims incorporate, either directly or indirectly, features like those discussed above with respect to claim 1, and therefore the remaining claims are seen to be allowable in view of Ebrahim and Higuchi, either by themselves or in combination with other references. Favorable action is respectfully requested.

In view of the foregoing remarks, this Application should be in condition for allowance. A Notice to this affect is respectfully requested. If there should be any issues remaining after this amendment, the Examiner is respectfully requested to call the undersigned Attorney to resolve such issues.

Applicants hereby petition for any extension of time which is required to maintain the pendency of this case. If there is a fee occasioned by this Amendment, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 50-3661. If the enclosed papers or fees are considered incomplete, the Patent Office is respectfully requested to contact the undersigned collect at (508) 616-2900, in Westborough, Massachusetts.

Respectfully submitted,



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